

ESTTA Tracking number: **ESTTA683348**

Filing date: **07/13/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215342
Party	Plaintiff Citigroup Inc.
Correspondence Address	JOHN P MARGIOTTA FROSS ZELNICK LEHRMAN & ZISSU PC 866 UNITED NATIONS PLAZA NEW YORK, NY 10017 UNITED STATES jm@fzlz.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	John P. Margiotta
Filer's e-mail	jm@fzlz.com
Signature	/John Margiotta/
Date	07/13/2015
Attachments	Extension Request (F1731298x96B9E).pdf(85956 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of: MULTI-CHOICE CASH

Application Serial No. 85/767,671

Published in the *Official Gazette* on September 10, 2013

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CITIGROUP INC.,	:		
	:		
Opposer,	:		
	:		
- against -	:		Opposition No. 91215342
	:		
JB CARTER ENTERPRISES, LLC,	:		
	:		
Applicant.	:		
	:		
	-X	:	

MOTION FOR AN EXTENSION OF SIXTY (60) DAYS OF ALL DATES

The answer date for Applicant is currently set for July 13, 2015. Pursuant to the Board's Order dated April 10, 2015, to request a further extension of this date, the parties must establish goods cause by demonstrating what progress the parties have made toward settlement.

The parties have made substantial progress on settlement discussions. They have exchanged written drafts of a comprehensive settlement agreement on several occasions, communicating today about this Agreement, and several times over the past week, including July 7, 10 and 11. All communications have been by email or phone, none in person. The parties also communicated in April and May regarding settlement, exchanging written drafts and comments by email.

At the current time, the comprehensive settlement agreement is mostly approved, and there is a single question outstanding from Opposer to Applicant regarding the public nature of the way in which the Applicant's mark will be used. That question was sent by email to

Applicant's counsel today, after Opposer's counsel communicated with in-house counsel for Opposer today regarding the outstanding remaining issues.

The parties are hopeful that they will quickly be able to resolve the remaining issues after this point is clarified, and anticipate that the sixty days sought here will be sufficient to conclude agreement.

The parties respectfully request that the Board re-set the remaining dates in this proceeding by moving all by sixty (60) days.

Though this motion is being filed by Opposer's counsel, Opposer has sought and received the consent of counsel for Applicant.

Dated: New York, New York
July 13, 2015

Respectfully submitted,

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: 

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Attorneys for Opposer Citigroup Inc.

CERTIFICATE OF SERVICE

The undersigned counsel for Opposer Citigroup Inc. hereby certifies that a true and correct copy of the attached **NOTICE OF OPPOSITION** was served via email upon Applicant's correspondent of record: Mark Borghese, Esq., Borghese Legal, Ltd., at mark@borgheselegal.com.


John Margiotta